

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

RIPPY OIL CO.

CIVIL ACTION

v.

NO.: 4:22-CV-00276

ACE AMERICAN INSURANCE CO.,  
CHARTIS SPECIALTY INSURANCE CO.,  
RISK SPECIALISTS COMPANIES  
INSURANCE AGENCY, INC.

JUDGE: KENNETH M HOYT

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY**  
**MEMORANDUM IN EXCESS OF PAGE LIMIT BY**  
**AIG SPECIALTY INSURANCE COMPANY AND**  
**RISK SPECIALISTS COMPANIES INSURANCE AGENCY, INC.**

NOW INTO COURT, through undersigned counsel, come Defendants, AIG Specialty Insurance Company (“ASIC”) and Risk Specialists Companies Insurance Agency (“Risk Specialists”), who respectfully seek leave of this Honorable Court to file a Reply Memorandum in Support of their Motion to Dismiss, or in the Alternative, to Transfer or Stay in excess of page limits set by this Court’s Rule VII(A). Undersigned counsel conferred with counsel for Rippy Oil Company, who has no objection to this Motion.

On February 21, 2022, ASIC and Risk Specialists filed a Motion to Dismiss, or in the Alternative, to Transfer or Stay and Brief in Support [R. Doc. 4].

On March 23, 2022, Rippy Oil Company filed its Response in Opposition to Defendants’ Motion to Dismiss, or in the Alternative, to Transfer or Stay [R. Doc. 23]. Rippy’s Response Memorandum is 29 pages in length.

In order to adequately respond to Rippy’s Response Memorandum, ASIC and Risk Specialists seek leave to file a 19-page reply brief—4 pages in excess of this Court’s Rule VII(A) page limitation.

Undersigned counsel conferred with Rippy's counsel, who does not object to this Motion.

WHEREFORE, ASIC and Risk Specialists respectfully request leave to file the Reply Memorandum in Support of their Motion to Dismiss, or in the Alternative, to Transfer or Stay in excess of the page limits set by this Court's Rule VII(A).

Respectfully Submitted,

/s/ Robert I. Siegel  
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Chartis Specialty Ins. Co. and Risk  
Specialists Companies Insurance Agency,  
Inc.*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for AIG Specialty Ins. Co. f/k/a Chartis Specialty Ins. Co. and Risk Specialists Companies Insurance Agency, Inc. conferred with Mike Morris, counsel for Rippy Oil Co., on April 29, 2022 who stated they have no opposition to the filing of this motion.

/s/ Robert I. Siegel  
ROBERT I. SIEGEL

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of April, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel for all parties to this proceeding.

/s/ Robert I. Siegel

ROBERT I. SIEGEL